

Rob



992 OLD EAGLE SCHOOL ROAD  
SUITE 916  
WAYNE, PENNSYLVANIA 19087  
(215) 687-9510

March 10, 1982  
C-585-3-3-31

TDD F3-8302-30  
Contract 68-01-6699

Ms. Linda Young Boornazian  
Environmental Protection Agency  
Sixth and Walnut Streets  
Philadelphia, PA 19106

Subject: Southern Gravuer - VAD 980552285  
(Reynolds Metals)

Dear Linda:

During the initial background collection stages for the above referenced site, Mike Nalipinski has been in contact with company representatives who have denied NUS access to their facility. Mike's telephone conversations of March 3, 1983 essentially provided the following information.

Southern Gravuer (TDD F3-8302-30) manufactures rotogravuer cylinders used by the printing industries. Their waste product is spent plating bath solution which is corrosive. The waste solution is pumped into an above-ground holding tank and then given to a licensed transporter for disposal. The people at Southern Gravuer, a subsidiary of Reynolds Metals, do not feel they fall under Superfund legislation for two reasons. First, they claim no hazardous material is stored or disposed of at the Sprouse Drive and Service Road site; secondly, Reynolds metals filed NOTIS reports of all of their sites and those of their subsidiaries. This filing was done as a precautionary measure to protect themselves from previous activities that may have occurred on the site.

According to Mr. Bent of Reynolds Metals, Environmental Division, the Southern Gravuer facility is part of an industrial park which was constructed in the late 1970's. He thought the site may have previously been farm land.

Mr. Bent also stated that Reynolds policy is to deny access to all Reynolds sites and those of their subsidiaries to EPA contractors. He went on to say that Reynolds is prepared to support their access policy with legal action.

Contacts: Mr. Charles Bent  
Staff Env. Engineer  
Reynolds Metals Co.  
6601 West Broad St.  
Richmond, VA 23261  
804-281-2918

Mr. David Cannon  
Plant Engineer  
Southern Gravuer H.Q.  
Louisville, KY  
502-637-5443

FIT Region III would like to refer this delicate situation to EPA Region III for their consideration. If you have any questions on this matter, do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donald Senovich".  
Donald Senovich  
Manger, FIT III

## NUS CORPORATION

## TELECON NOTE

CONTROL NO:

0001

DATE:

3 MARCH 1983

TIME:

1400 hrs

DISTRIBUTION:

- F.le  
- EPA MEMO

BETWEEN:

DAVID CANNON

OF: SOUTHEAST GRAVURE

in Louisville, KY

PHONE: 502 637 5443

~~(804) 281-3871~~

AND:

MICHAEL NALPINSKI

(NUS)

DISCUSSION:

Mr. Cannon stated that:

1. S. Gravure is a subsidiary of Reynolds Metals.
2. He has instructions from Reynolds to ~~deny~~ refuse access to all EPA contractors.
3. If I would like to pursue this issue I should call LARRY TROPEA Director of Environmental ... at Reynolds H.Q. in Richmond Va.

ACTION ITEMS:

LARRY C TROPEA'S ph: 804-281-3871 in Richmond

I called Mr. Tropea. See Telcon # 0002

## NUS CORPORATION

## TELECON NOTE

CONTROL NO:

0002

DATE:

3 March 1983

TIME:

1430 hrs

DISTRIBUTION:

- File  
- EPA MEMO

Reynolds Metals  
6601 WEST Broad ST  
Richmond VA 23261

BETWEEN:

MR LARRY C. TROPEA

OF:

Reynolds Metals

PHONE:

(804)-281-3871

AND:

MICHAEL NALIPINSKI

(NUS)

DISCUSSION:

Mr. TROPEA WAS NOT IN I got Transferred to MR. CHAS. BENT

Mr. Bent stated :

1. He filed all Superfund NOTIS's for Reynolds & their subsidiaries.

2. He should have been contacted instead of Cannon.

3. S. Graver engraves cylinders for printing. They moved to the Spruce & Settler Rd Industrial Park in 1979.

4. He filed the NOTIS for S. Graver to protect Reynolds from litigation which might ensue as a result of prior activities before they moved in.

5. He thought the location might have been farmland prior to 1979.

6. Bent also stated "No EPA contractors

ACTIONS/TIPS:

would be allowed on any Reynolds sites and they would go to court." (his tone was NOT belligerent)

7. If we want to try to gain access we should contact him & he would direct us to their Law Dept.

INSTALLATION'S EPA I.D. NO.	<div>RCRA</div> <div>PLEASE PLACE LABEL IN THIS SPACE</div>	information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
I. NAME OF INSTALLATION		
II. INSTALLATION MAILING ADDRESS		
III. LOCATION OF INSTALLATION		

000000

**FOR OFFICIAL USE ONLY**

[illegible]

I. NAME OF INSTALLATION

## II. INSTALLATION MAILING ADDRESS

[illegible]

STREET OR ROUTE NUMBER

C		STREET OR ROUTE NUMBER																																					
5		S	P	R	O	U	S	E	D				R	I	V	E	A				N	D	S				E	T	T	L	E	R	R				O	A	D
15		16														25																							
		CITY OR TOWN																						ST.		ZIP CODE													
C																																							
6		R	I	C	H	M	O	N	D															V	A	2	3	2	3	1									
15		16														25																							

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.) \_\_\_\_\_

C	A	N	N	O	N	,	D	A	V	I	D	P	L	A	N	T	E	N	G	I	N	E	E	R	5	0	2	-	6	3	7	-	5	4	4	3
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL M = NON-FEDERAL	M	<input type="checkbox"/> 37 A. GENERATION	<input type="checkbox"/> 38 B. TRANSPORTATION (complete item VII)
		<input checked="" type="checkbox"/> 39 C. TREAT/STORE/DISPOSE	<input type="checkbox"/> 40 D. UNDERGROUND INJECTION

## A. GENERATION

B. TRANSPORTATION (complete item VII)

☒ C. TREAT/SPARE/DISPOSE

☐ D. UNDERGROUND INJECTION

**VII. MODE OF TRANSPORTATION** (transporters only - enter "X" in the appropriate box(es))

☐ **A. AIR**      ☐ **B. RAIL**      ☐ **C. HIGHWAY**      ☐ **D. WATER**      ☐ **E. OTHER (specify):**

**B. RAIL**

C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

### VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. NO. \_\_\_\_\_

☒ A. FIRST NOTIFICATION ☐ B. SUBSEQUENT NOTIFICATION (complete item C)

IV. DESCRIPTION OF HAZARDOUS WASTES



RECEIVED  
RCRA SECTION  
EPA REGION III

## REYNOLDS ALUMINUM

REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261

JUN 16 1981 00268

1981 June 09

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency  
Region 3  
Sites Notification  
P. O. Box 1480  
Philadelphia, PA 19107

Re: EPA Superfund Notifications For:  
Chester  
Downingtown  
Bellwood Extrusion  
Bellwood Printing  
Bellwood Reclamation  
Bellwood Plant #44  
Richmond North Plant  
Richmond South Plant  
Southern Gravure  
Grottoes

Dear Sir:

Please find attached completed Notification Forms for the various Reynolds facilities located within Region 3.

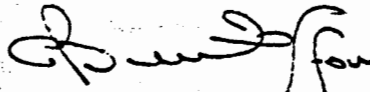
Reynolds believes that the interpretative notice and policy statement published in the Federal Register (46 FR 22144) in conjunction with the reporting requirements under Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (hereafter "Superfund" or "Act") is imprecise and does not provide a complete interpretation of the Act's reporting requirements. Recent discussions with Agency representatives also indicates there is still some intra-Agency confusion as to the Agency's exact interpretation of the Act's reporting requirements.

Therefore, submission of these notifications by Reynolds Metals Company is not in any way an admission that any of the above facilities now, or in the past, have ever generated hazardous wastes, or that these plants, now or in the past, were storers, treaters, or disposers of hazardous waste or that Reynolds is the owner or operator of hazardous waste management facilities. Reynolds Metals Company reserves the right to withdraw any of the attached notification forms at any time in the future. Further, due to the imprecise nature of these reporting requirements, Reynolds reserves the right to amend these notifications or to submit additional information at any time in the future.

• 1981 June 09  
Page 2  
EPA Region 3

We request that this letter be attached to and made a permanent part of the attached notifications. If you have any questions please contact C. R. Bent at (804/281-2918) or myself at (804/281-3871).

Sincerely,

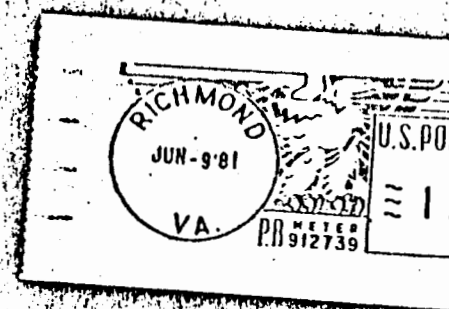


Lawrence C. Tropea, Jr., P.E.  
Director of Environmental Control  
Environmental Control Department

/ct

Attachments

REYNOLDS ALUMINUM  
REYNOLDS METALS COMPANY • RICHMOND, VIRGINIA 23261



REYNOLDS METALS COMPANY

RICHMOND, VIRGINIA 23261

CERTIFIED MAIL RETURN RECEIPT REQUESTED

US EPA Region 3  
Sites Notification  
~~P.O. Box 1480~~  
Philadelphia, PA

(F) *6th & Market*  
~~19107~~ 19106

RETURN POSTAGE GUARANTEED

R-6 (REV. 6-68)

CERTIFIED MAIL

759730

RETURN RECEIPT REQUESTED

# EPA Notification of Hazardous Waste Site

United States  
Environmental Protection  
Agency  
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

R ORIGINAL  
(Red)

810609

VAS 800001204

## Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name Reynolds Metals Company  
Street 6601 West Broad Street  
City Richmond State VA Zip Code 23261

## Site Location:

Enter the common name (if known) and actual location of the site.

REYNOLDS METAL CO  
Name of Site A Southern Gravure Services Inc.  
Street P. O. Box 25131 Sprouse Dr. & Settler Rd.  
City Richmond County Henrico State VA Zip Code 23231

## Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Bent, Charles, Staff Env. Engineer  
Phone 804/281-2918

## Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) 1979 To (Year) 1980

VAD-98-055-2285

## Waste Type: Choose the option you prefer to complete

**Option 1:** Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

### General Type of Waste:

Place an X in the appropriate boxes. The categories listed on ap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☒ Other (Specify)  
Spent plating  
bath solution  
Corrosive

### Source of Waste:

Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☒ Other (Specify)  
manufacture of

**Option 2:** This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

### Specific Type of Waste:

EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.




JUN 9 1981 00277

RECEIVED  
RCRA SECTION  
EPA REGION III



# Notification of Hazardous Waste Site

Side Two

## Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

## Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) Unknown

## Total Facility Waste Amount

cubic feet Unknown

gallons 23

## Total Facility Area

square feet Unknown

acres ORIGINAL

(Red)

## Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☒ None

Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

## H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a sketching map showing the site location.

N

## I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

## J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional.

Name Lawrence C. Tropea, Jr.

Street 6601 West Broad Street

City Richmond State VA Zip Code 23261

- ☒ Owner, Present  
☐ Owner, Past  
☐ Transporter  
☐ Operator, Present  
☐ Operator, Past

ENVIRONMENTAL PROTECTION AGENCY  
NOTIS DATA MANAGEMENT SYSTEM  
COMMENT MAINTENANCE FORM

UNKNOWN

600

CARD  
CODE NTS IDENTIFICATION NO. SPENT PLATING BATH SOLUTION CORROSIVE 300  
F 1 2 13 14 15 16 C 55 56 58 80 S

CARD  
CODE NTS IDENTIFICATION NO. MFG OF ROTOGRAVURE CYLINDERS 400  
F 1 2 13 14 15 16 C 55 56 58 S

CARD  
CODE NTS IDENTIFICATION NO.   
F 1 2 13 14 15 16 C 55 56 58 S

CARD  
CODE NTS IDENTIFICATION NO.   
F 1 2 13 14 15 16 C 55 56 58 S

CARD  
CODE NTS IDENTIFICATION NO. COMMENT  
F 1 2 13 14 15 16 C 55 56 58 S